

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERICK JAMAL HENDRICKS,

Defendant.

CASE NO. 1:16CR265

JUDGE JOHN R. ADAMS

FILED  
2018 MAR 21 PM 2:08  
CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**STIPULATION REGARDING SURESPOT**


The United States of America, by and through its attorneys, Matthew Shepherd and Mark Bennett, Assistant United States Attorneys, and Rebecca Magnone, Trial Attorney, National Security Division, and defendant, Erick Jamal Hendricks, by and through his attorneys, David Doughten and Stephen Hartman, hereby stipulate and agree to the following:

1. Surespot is a secure mobile messaging application which uses end to end encryption for users to communicate securely. It allows people to send and receive encrypted messages anonymously to ensure privacy. Users pick a unique username to send and receive those messages. If a user deletes her account, the username and all communication sent and received through that account is also deleted through Surespot. Once an account is deleted, there is no record of that account having ever existed. Surespot, however, will allow a deleted username to be re-used after a period of time.
2. On Surespot, there is a private key stored on a device that is the key to unlocking all of the data. In the case of a lost or stolen device, if the key is lost along with it, so is all of the data. Identity backup/restore and key versioning help to mitigate this problem. A user may back up their encrypted identity (username and key pair history) to device storage

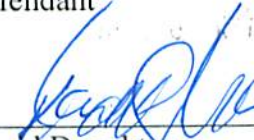
or the cloud and restore them upon demand. The security is only as strong as the password used to store the identity in whatever cloud service and the Surespot password.

APPROVED:

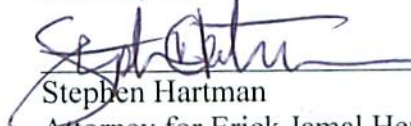
Date: 3-5-18

  
Erick Jamal Hendricks  
Defendant


Date: 3-5-18

  
David Doughten  
Attorney for Erick Jamal Hendricks


Date: 3-5-18

  
Stephen Hartman  
Attorney for Erick Jamal Hendricks

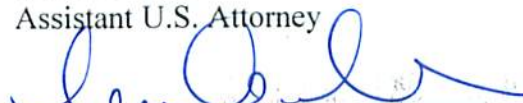
Date: 3-1-18

  
Matthew Shepherd  
Assistant U.S. Attorney

Date: 3/7/18

  
Mark Bennett  
Assistant U.S. Attorney

Date: 3/7/18

  
Rebecca Magnone  
Trial Attorney, National Security Division